

June 15, 2005

Comment 73

Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
Washington, D. C., 20044-4412

RE: Notice No. 41, P. O. Box 14412

I have several comments concerning your request for public comment on labeling and advertising of wines, spirits, and malt beverages. You will be getting very few replies from the people you really need to hear from unless you make your request wider known to the general public. Most people who will benefit from alcohol labels do not read the federal register, so you are going to be getting a very biased reply. I assume distributors of alcohol and those that profit from its sale or advertising will all be notified by their lobbyist to respond. I don't think people in rehabilitation clinics, the local bar, or the underage minors will be equally represented in your audience.

It is very important to me that the size of drink icons and standard drink picture references be on the label. Most Americans are not sure of serving size or amount of alcohol in a drink and are unable to judge how much alcohol they have consumed when they are drinking. With this type label the average drinker then will be more informed before they get behind the wheel of a car about the actual amount of alcohol they have consumed and not just the number of ounces of liquid they have had to drink.

During pregnancy alcohol use can cause birth deficits, such as low birth weight, learning disabilities, heart conditions and mental retardation. Drinking among young girls and women of child bearing age continues to increase. Warning labels are far cheaper than the cost these affected children have in terms of economic and social drains to a family and an already struggling health care system. (The cost for caring for a single child diagnosed with an alcohol related birth defect can be more than \$1.4 million.)

Increased taxes and warning labels can be effective in changing high-risk behaviors. Use of labels warning about dangers of drinking during pre-conception and pregnancy, education about standard drink size and increased taxes are low cost interventions that will aid in the prevention of Fetal Alcohol Syndrome. An increased tax could fund the warning labels and state funded alcohol rehabilitation centers.

Please require advertisements about alcohol to 1) include the U.S. Surgeon General's warning that women should not drink during pregnancy; 2) include a message encouraging women who are pregnant and unable to stop drinking should seek help; and 3) rotate the labels or change the drawings on an annual basis to promote reading and retention of the message.

Sincerely,



Renn McClintic-Doyle  
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*Mother to 16 year old daughter with Fetal Alcohol Syndrome*